

**From:** [Ritchie Graves - NOAA Federal](#)  
**To:** [LaSpina, Jim \(UTC\)](#)  
**Cc:** [Opalski, Dan](#); [Palmer, John](#); [Lidgard, Michael](#); [Burgess, Karen](#); [Richard Domingue \(richard.domingue@noaa.gov\)](#); [Michael Tehan \(Michael.Tehan@noaa.gov\)](#); [McGowan, Vincent \(ECY\)](#); [Posner, Stephen \(UTC\)](#)  
**Subject:** Re: For Your Review: CGS - NPDES revised permit and RTC  
**Date:** Monday, August 18, 2014 1:39:50 PM  
**Attachments:** [NOAA Technical Comments on DRAFT Energy Facility Site Evaluation Council - 8-18-2014.docx](#)

---

Jim (and everyone):

On behalf of the NMFS - Interior Columbia Basin Office, I would like to thank you for the opportunity to discuss issues relating to the Columbia Generating Station last Monday and also for sharing the draft language with us.

We offer you a few comments and a suggested edit which we think would improve the clarity and intent of the document. They are attached.

If you have any questions regarding our technical comments, please contact Rich Domingue or myself. We look forward to seeing the final NPDES permit. And we are prepared to collaborate with Energy Northwest and WDFW in the design of an entrainment study.

Best wishes,  
Ritchie

[Ritchie Graves](#)  
[Columbia Hydropower Branch](#)  
[Interior Columbia Basin Office](#)  
[NOAA Fisheries, West Coast Region](#)

[phone: 503-231-6891](#)  
[cell: 503-730-5148](#)

On Tue, Aug 12, 2014 at 10:48 AM, LaSpina, Jim (UTC) <[jlaspina@utc.wa.gov](mailto:jlaspina@utc.wa.gov)> wrote:

EFSEC appreciates the opportunity to meet with you yesterday to navigate the uncharted waters of the CWA-ESA nexus.

As we discussed at yesterday's meeting, EFSEC agreed to send the revised permit and response to comments documents for your 'pre-view' prior to formal submittal of the 'final proposed permit' to EPA. EFSEC believes the attached documents accurately capture yesterday's agreements and will fulfill the requirements of the Clean Water Act. Vince McGowan provides some clarification below concerning the revisions.

Please review the documents at your earliest convenience. EFSEC would like to formally submit the final proposed permit for your review as soon as possible.

Jim

*Jim La Spina*

*Energy Facility Siting Specialist*

*Energy Facility Site Evaluation Council*

*Utilities and Transportation Commission*

*PO Box 43172*

*Olympia, WA 98504*

[360.664.1362](tel:360.664.1362)

---

**From:** McGowan, Vincent (ECY)

**Sent:** Tuesday, August 12, 2014 8:20 AM

**To:** LaSpina, Jim (UTC)

**Cc:** Moore, Bill (ECY)

**Subject:** CGS - revised permit and RTC

Hello Jim –

Attached are a permit and response to comments (RTC) for Columbia Generating Station, revised based on feedback at yesterday's meeting with EPA and NMFS. I accepted all earlier edits and updated dates in the footers to 8/12/14 in this version. The only redline edits now showing are changes made following the meeting. In short, I added "...[the Permittee] *may suspend the entrainment characterization study* [and must]..." to S12.B.3. I also added explanatory text to the RTC on page 30. Let me know if you have questions.

**Vince McGowan**

Department of Ecology | Water Quality

PO Box 47600 | Olympia, WA 98504-7600 | ph. [360-407-6433](tel:360-407-6433)